

John R. McCravy, III
Board Certified
National Board of Trial Advocacy



Respond to: ■ Greenwood Office:
1629 Bypass 72 N.E.
Greenwood, SC 29649
(864)388-9100
(864)388-9104 - Facsimile

234281

December 22, 2011

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RECEIVED

DEC 28 2011

PSC SC
MAIL / DMS

RE: BHC Trucking v. Duke Energy Carolinas, LLC
Docket No. 2011-482-E

Dear Ms. Boyd:

Please find enclosed our Response to Defendant's Proposed Submission of Written Testimony in the above referenced matter.

Please return a filed copy in the envelope provided.

Respectfully Submitted,

McCRAVY, NEWLON & STURKIE LAW FIRM, P.A.

A handwritten signature in black ink, appearing to read "John R. McCravy, III".
John R. McCravy, III

JRM/jcf
Enclosures

cc: BHC Trucking
Shannon Bowyer Hudson, -SC ORS
Ronnie D. Shealy - Duke Energy

RECEIVED
2011 DEC 28 AM 11:30
SC PUBLIC SERVICE
COMMISSION

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-482-E

In re:)	
)	
BHC Trucking,)	RESPONSE TO DEFENDANT'S PROPOSED SUBMISSION OF WRITTEN TESTIMONY
Complainant,)	
)	
v.)	
)	
Duke Energy Carolinas, LLC,)	
Respondent.)	

TO: THE PUBLIC SERVICE COMMISSION, BONNIE SHEALY, ATTORNEY FOR
RESPONDENT AND SHANNON BOWYER HUDSON, ATTORNEY FOR THE
OFFICE OF REGULATORY STAFF:

YOU ARE HEREBY NOTIFIED THAT:

JOHN R. MCCRAVY, III, of THE MCCRAVY, NEWLON & STURKIE LAW FIRM,
P.A., counsel for the Complainant, hereby objects to copious amounts of testimony
contained in the proposed testimony of Barbara Yarbrough on behalf of the defendants,
Duke Energy Carolinas, LLC. The grounds for this objection are that the testimony is
largely based on hearsay and is not based on personal knowledge of the declarant,
Barbara Yarbrough. Complainant reserves their right to cross-examine Barbara
Yarbrough at the hearing or in the alternative moves to dismiss the proposed testimony
on the same grounds.

McCRAVY, NEWLON & STURKIE LAW FIRM, P.A.

BY: _____

John R. McCravy, III

Attorney for the Complainant
1629 Bypass 72 NE
Greenwood, SC 29649
(864) 388-9100

Greenwood, S.C.
December 21, 2011

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2011 DEC 28 AM 11:30
SOUTH CAROLINA
PUBLIC SERVICE
COMMISSION

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2011-482-E

In re:)
)
BHC Trucking,)
Complainant,)
)
v.)
)
Duke Energy Carolinas, LLC,)
Respondent.)

CERTIFICATE OF SERVICE

The undersigned of McCRAVY NEWLON & STURKIE LAW FIRM, P.A., Attorney for the Claimant, hereby certifies that on December 22, 2011, she served a copy of the pleadings specified below by mailing the same in an envelope with sufficient postage attached via first class mail by depositing the same in the U.S. Mail, Greenwood, South Carolina, to the address referenced below.

PLEADINGS:

1. RESPONSE TO DEFENDANT'S
PROPOSED SUBMISSION OF
WRITTEN TESTIMONY
2. CERTIFICATE OF SERVICE
BY MAIL

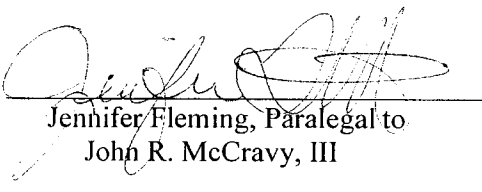
SERVED:

Shannon Bowyer Hudson
SC Office of Regulatory Staff
1401 Main St., Suite 900
Columbia, SC 29201

Bonnie D. Shealy
Robinson McFadden & Moore
P.O. Box 944
Columbia, SC 29202

McCRAVY NEWLON & STURKIE LAW FIRM, P.A.

BY:


Jennifer Fleming, Paralegal to
John R. McCravy, III

Attorney for Claimant
1629 Bypass 72 NE
Greenwood, SC 29649
(864) 388-9100

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December 22, 2011